

**ACCOUNT SUMMARY**

Creditor: Verizon Wireless  
 Account No.: [REDACTED]  
 I.C. System Reference No.: [REDACTED]

**BALANCE DUE:** **\$1,115.40**

Principal Due: \$1,014.00  
 Collection Charge Due: \$101.40

**SETTLEMENT OFFER**

2/10/2021

Jessica L Bednarczyk:

Would you be willing to pay 70% of the BALANCE DUE above?

To resolve the BALANCE DUE indicated above, our office will accept a reduced payment amount of \$780.78.

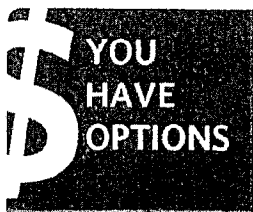
For more information about your account or to make payment, please visit <https://www.icsystem.com/consumer>. You may also accept this offer by calling 866-858-2784 or sending payment by mail.

If you will be receiving a tax refund and would like to use it to pay your account, please call us to make payment arrangements.

We are a debt collector attempting to collect a debt and any information obtained will be used for that purpose.

This does not contain a complete list of the rights consumers have under Federal, State, or Local laws.

I.C. System, Inc. | 444 Highway 96 East, PO Box 64378, St. Paul MN 55164-0378



- For questions or payment please go to: <https://www.icsystem.com/consumer>
- Mail check or money order payable to Verizon Wireless with coupon below
- Call Toll-Free at 866-858-2784

Jessica Bednarczyk  
182 Mason Street, Apt. 2  
Exeter, PA 18643

Plaintiff

v.

I.C. System, Inc.  
444 Highway 96 East  
St. Paul, MN 55164

Defendant

IN THE LUZERNE COUNTY  
COURT OF COMMON PLEAS

Civil Action

No. 2021-09880

Jury Trial Demanded

### NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by plaintiff(s). You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

### AVISO

A USTED SE LE HA DEMANDADO EN LA CORTE. Si usted quiere defenderse contra la demanda expuesta en las siguientes páginas, tiene que tomar acción en un plazo de veinte (20) días después que reciba esta demanda y aviso, por presentar una notificación de comparecencia escrita personalmente o por un abogado y radicar por escrito en la Corte sus defensas u objeciones a las demandas presentadas en su contra. Se le advierte que si falla en hacerlo, el caso podría seguir adelante sin usted y un fallo podría ser dictado en su contra por la Corte sin previo aviso por cualquier dinero reclamado en la demanda o por cualquier otro reclamo o desagravio pedido por el/la demandante. Puede que usted pierda dinero o propiedad u otros derechos importantes para usted. USTED DEBE LLEVAR ESTE DOCUMENTO A SU ABOGADO INMEDIATAMENTE. SI NO TIENE ABOGADO, DIRÍJASE O LLAME POR TELÉFONO A LA OFICINA CUYA DIRECCIÓN SE ENCUENTRA ABAJO. ESTA OFICINA PUEDE

PROVEERLE CON INFORMACIÓN SOBRE COMO CONTRATAR UN ABOGADO. SI NO TIENE LOS FONDOS SUFICIENTES PARA CONTRATAR UN ABOGADO, ESTA OFICINA PODRÍA PROPORCIONARLE INFORMACIÓN ACERCA DE AGENCIAS QUE PUEDAN OFRECERLES SERVICIOS LEGALES A PERSONAS QUE REÚNAN LOS REQUISITOS A UN HONORARIO REDUCIDO O GRATIS.

North Penn Legal Services, Inc.  
33 N. Main Street,  
Suite 200  
Pittston, PA 18640  
(570) 299-4100  
(877) 953-4250 Toll free  
(570) 824-0001 Fax

101 West Broad Street,  
Suite 513  
Hazelton, PA 18201  
(570) 455-9512  
(877) 953-4250 Toll Free  
(570) 455-3625 Fax

Servicios Legales de North Penn, Inc.  
33 la Calle Main del Norte, Oficina 200  
Pittston, PA 18640  
(570) 299-4100  
(877) 953-4250 Llamada gratuita  
(570) 824-0001 Fax

101 la Calle Broad del Oeste,  
Oficina 513  
Hazelton, PA 18201  
(570) 455-9512  
(877) 953-4250 Llamada gratuita  
(570) 455-3625 Fax

PROTHONOTARY LUZERNE COUNTY  
FILED OCT 15 21 PM 1:09Jessica Bednarczyk,  
Plaintiff

v.

I.C. System, Inc.,  
DefendantIN THE LUZERNE COUNTY  
COURT OF COMMON PLEAS

Docket No. 2021-09880

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**COMPLAINT****I. INTRODUCTION**

1. This is an action for damages brought by an individual consumer for violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.* (hereinafter “the Act”). Defendant illegally disclosed information about Plaintiff to a third-party, in direct violation of the Act.

**II. JURISDICTION AND VENUE**

2. Jurisdiction of this Court is proper pursuant to 15 U.S.C. § 1692k(d), which permits an action under the Act to be brought in any court of competent jurisdiction.

3. Venue in this Court is proper in that Plaintiff resides here, the conduct complained of occurred here, and Defendant transacts business here.

**III. PARTIES**

4. Plaintiff is a natural person residing at 182 Mason Street, Apt. 2, Exeter, PA, 18643.

5. Plaintiff is, and at all relevant times was, a “consumer” as defined by 15 U.S.C. § 1692a(3).

6. I.C. System, Inc. is an entity with an address of 444 Highway 96 East, St. Paul, MN 55164.

7. The principal purpose of Defendant’s business is the collection of debts.

8. Defendant has reason to believe that a non-trivial portion of the accounts that it collects are for obligations for which the money, property, insurance or services which were the subjects of the transactions were primarily for personal, family, or household purposes.

9. Defendant has reason to believe that it is probably true that the principal purpose of its business is the collection of “debt” as that term is defined by 15 U.S.C. § 1692a(5).

10. Defendant regularly attempts to collect debts asserted to be due to another. The term “debt” is used in this allegation as that term is defined by 15 U.S.C. § 1692a(5).

11. Defendant is a “debt collector” as defined by 15 U.S.C. § 1692a(6).

#### IV. STATEMENT OF CLAIM

12. The foregoing paragraphs are incorporated herein by reference.

13. Congress enacted the Act to prevent real harm. Congress found that “abusive debt collection practices [we]re carried on to a substantial extent in interstate commerce and through means and instrumentalities of such commerce.” 15 U.S.C. § 1692(d).

14. One of the abusive debt collection practices the Act was designed to curb was “invasions of individual privacy.” 15 U.S.C. § 1692(a).

15. In order to help achieve this goal, the Act prohibits, absent a few exceptions not relevant to the present matter, a debt collector from communicating with a third-party in connection with the collection of a debt. 15 U.S.C. § 1692c(b).

16. I.C. System, Inc. is a company which was attempting to collect an alleged debt (“the Debt”) from Plaintiff.

17. On or shortly before February 10, 2021, I.C. System, Inc. decided to send a letter to Plaintiff regarding the Debt.

18. However, rather than preparing and mailing the letter to Plaintiff on its own, I.C. System, Inc. chose to utilize a third-party vendor to perform these services on its behalf. The factual contentions in this paragraph will likely have evidentiary support after a reasonable opportunity for further investigation or discovery.

19. As part of this process, I.C. System, Inc. conveyed information regarding the Debt to the third-party vendor.

20. The information I.C. System, Inc. conveyed to the third-party included Plaintiff's name, address, status as a debtor, as well as the precise amount of the Debt and the entity to which Plaintiff allegedly owed the Debt.

21. The conveyance of this information to the third-party constituted a "communication" as that term is defined in 15 U.S.C. § 1692a(2).

22. The conveyance of this information to the third-party was a communication made in connection with the collection of a debt. *See Hunstein v. Preferred Collection & Mgmt. Servs., Inc.*, 994 F.3d 1341 (11th Cir. 2021).

23. The third-party then, at the direction of I.C. System, Inc., utilized this information to generate and mail a letter to Plaintiff.

24. This collection letter was a "communication" as that term is defined in 15 U.S.C. § 1692a(2).

25. The collection letter was mailed on or about February 10, 2021. A redacted copy of this collection letter is attached as Exhibit A.

26. Plaintiff never consented to I.C. System, Inc. communicating with the third-party vendor in connection with the collection of the Debt.

27. By improperly conveying information regarding Plaintiff to a third-party in connection with the collection of a debt, I.C. System, Inc. violated 15 U.S.C. § 1692c(b). *See Hunstein v. Preferred Collection & Mgmt. Servs., Inc.*, 994 F.3d 1341 (11th Cir. 2021).

WHEREFORE, Plaintiff demands judgment against Defendant for statutory damages of no more than \$1,000.00, costs, attorney's fees, and such other and further relief as deemed just and proper.

V. DEMAND FOR JURY TRIAL

28. Plaintiff demands a trial by jury as to all issues so triable.

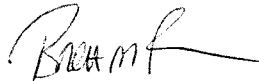


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Brett Freeman  
Bar Number: PA 308834  
Sabatini Freeman, LLC  
216 N. Blakely St.  
Dunmore, PA 18512  
Attorney for Plaintiff  
Phone (570) 341-9000

**CERTIFICATION OF COMPLIANCE**

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.



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Sabatini Freeman, LLC  
216 N. Blakely St.  
Dunmore, PA 18512  
Attorney for Plaintiff  
Phone (570) 341-9000

**Verification of Complaint and Certification by Plaintiff**

Plaintiff, Jessica Bednarczyk, being duly sworn according to law, deposes as follows:

1. I am a plaintiff in this civil proceeding.
2. I have read the above-entitled civil Complaint prepared by my attorneys and I believe that all of the facts contained in it are true, to the best of my knowledge, information and belief formed after reasonable inquiry.
3. I believe that this civil Complaint is well grounded in fact and warranted by existing law or by a good faith argument for the extension, modification, or reversal of existing law.
4. I believe that this civil Complaint is not interposed for any improper purpose, such as to harass the Defendant, cause unnecessary delay to the Defendant, or create a needless increase in the cost of litigation to the Defendant, named in the Complaint.
5. I have filed this civil Complaint in good faith and solely for the purposes set forth in it.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 09-29-2021

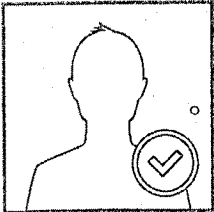
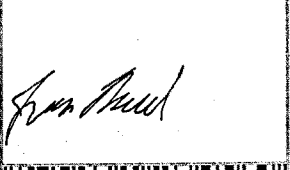

*Jessica Bednarczyk*  
Jessica Bednarczyk, Plaintiff



# Signature Certificate

Document Ref.: GG27T-MZXGX-DHLA8-8FMBC

Document signed by:

	<b>Jessica Bednarczyk</b> Verified E-mail: jlbednarczyk93@gmail.com	
IP: 207.172.49.220      Date: 29 Sep 2021 12:38:03 UTC		

Document completed by all parties on:  
29 Sep 2021 12:38:03 UTC

Page 1 of 1



Signed with PandaDoc.com

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SABATINI FREEMAN, LLC

CARLO SABATINI\*  
KRISTIN SABATINI  
BRETT FREEMAN

216 N. Blakely St.  
Dunmore, PA 18512  
Phone: (570) 341-9000  
Fax: (570) 504-2769  
Satellite Office: Wilkes-Barre 823-9000

October 7, 2021

I.C. System, Inc.  
444 Highway 96 East  
St. Paul, MN 55164

*VIA CERTIFIED MAIL RETURN RECEIPT REQUESTED*

**RE: Jessica Bednarczyk v. I.C. System, Inc.  
Luzerne County Court of Common Pleas  
Docket No. 2021-cv-09880**

Dear Sir or Madam:

Enclosed please find a time-stamped complaint in the above-referenced matter. Please ensure that all evidence related to this lawsuit is preserved. If you have any question about whether evidence would be related to the lawsuit, please contact me to discuss.

Sincerely yours,



Brett M. Freeman

BF/smd

Sabatini Freeman, LLC  
216 N. Blakely Street  
Dunmore, PA 18512

**CERTIFIED MAIL®**



7021 0350 0001 7403 6274

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55164

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DUNMORE, PA  
18512  
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AMOUNT

**\$7.58**

R2304W121289-25

I.C. System, Inc.  
444 Highway 96 East  
St. Paul, MN 55164

*Scanned Copy to  
Consumer Affairs  
Gave Christine  
Original 10/12  
JR*

55127-255744

